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11 *Attorneys for the United States*

12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 SAFWAT AHMED MUHI AL BAALI,  
15 Plaintiff,

16 v.

17 KRISTJEN NIELSEN, in her official  
18 capacity as Secretary of Homeland Security,  
19 U.S. DEPARTMENT OF HOMELAND  
20 SECURITY, LEE CISSNA, in his official  
21 capacity as Directory of U.S. Citizenship  
22 and Immigration Services, U.S.  
23 CITIZENSHIP AND IMMIGRATION  
24 SERVICES, the UNITED STATES OF  
25 AMERICA and JOHN DOE 1 through  
26 XX, inclusive

27 Defendants.

Case No. 2:18-cv-02213-APG-PAL

**STIPULATION FOR EXTENSION OF  
TIME TO FILE ANSWER  
(First Request)**

28 Pursuant to Local Rule 6-1, United States of America, on behalf of Federal  
Defendants, hereby requests a 30-day extension of time to file an answer or otherwise  
respond to Plaintiff's Complaint. (ECF No. 1). Based on the date of service of the  
Summons and Complaint on the United States, the answer or other response is due by  
February 11, 2019. With the extension, the deadline to answer or otherwise respond would  
be March 13, 2019.

1 At midnight on December 21, 2018, the continuing resolution that had been funding  
2 the Department of Justice expired and appropriations to the Department lapsed. During  
3 the lapse in appropriations, federal law and Department policy prohibited counsel for the  
4 United States from working on this matter. After 35 days, on Friday, January 25, 2019, the  
5 United States Congress enacted and the President signed a new continuing resolution  
6 funding the Department. The United States requests this 30 extension to allow it to assess  
7 this matter and respond appropriately.

8 This stipulation is not sought for purposes of delay or any other improper purposes.  
9 It is the first stipulation for an extension of time to file a response.

10 WHEREFORE, the parties respectfully request this stipulation be granted and that  
11 the answer or other response be made due by **March 13, 2019**.

12 Respectfully submitted this 31st day of January 2019.

13 REZA ATHARI & ASSOCIATES

NICHOLAS A. TRUTANICH  
United States Attorney

14  
15 /s/ Luther Snavely  
16 LUTHER SNAVELY, ESQ.  
17 3365 Pepper Lane, Suite 102  
Las Vegas, NV 89120

/s/ Troy K. Flake  
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Assistant United States Attorney

18 *Attorneys for Plaintiff*

*Attorneys for the United States*

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21  
22 **IT IS SO ORDERED:**

23  
24   
25 UNITED STATES DISTRICT JUDGE  
26 UNITED STATES MAGISTRATE JUDGE

27 DATED: January 31, 2019  
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